

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

ORIGINAL

FILED '08 MJ21 17

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAUL RODRIGUEZ-OROZCO (1),

aka Raulito,

aka , Viruta

JUAN RAMON PEREZ-MASCURRO (2),

aka Cacheton,

aka Panza,

ALEXANDER FLORENCIO MAYORQUIN (3)

Defendants.

Magistrate Case No.

2008 JUL 11 PM 1:36

COMPLAINANT FOR VIOLATION OF:

SOUTHERN DISTRICT OF CALIFORNIA

Title 21, U.S.C., Section 841(a)(1), 846

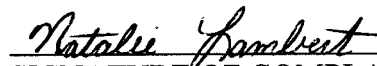
DEPUTY

Conspiracy to Distribute a Controlled Substance

The undersigned complainant, being duly sworn, states:

From on or October 2007 continuing up to on or about July 10, 2008, within the Southern District of California and elsewhere, defendants RAUL RODRIGUEZ-OROZCO (1), aka Raulito, aka Viruta, JUAN RAMON PEREZ-MASCURRO (2), aka Cacheton, aka Panza, and ALEXANDER FLORENCIO MAYORQUIN (3), did knowingly and intentionally conspire and agree with each other and with other persons known and unknown to distribute controlled substances, to wit: 500 grams and more of methamphetamine, a Schedule II controlled substance, and one kilogram and more of heroin, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.



SIGNATURE OF COMPLAINANT

Natalie Lambert

Special Agent

Federal Bureau of Investigation

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 11th DAY OF JULY 2008.



WILLIAM McCURINE, JR.

UNITED STATES MAGISTRATE JUDGE

CONTINUATION OF COMPLAINT:

**RAUL RODRIGUEZ-OROZCO (1), JUAN RAMON PEREZ-MASCURRO (2),
ALEXANDER FLORENCIO MAYORQUIN (3)**

STATEMENT OF FACTS

1. I am a duly appointed Special Agent of the FBI having been employed as such since May 15, 2005. I am authorized to investigate violations of the federal narcotics laws, to include Title 21, USC, Section 841 (a)(1) and 846.

2. Since February 2008, I have been involved in a multi-agency investigation being conducted by Special Agents of the Federal Bureau of Investigation (FBI), Drug Enforcement Administration (DEA), and San Diego Police Department (SDPD), investigating the drug trafficking activities of Raul RODRIGUEZ-OROZCO, Juan PEREZ-MASCURRO, Alexander Florencio MAYORQUIN, and others. The investigation involved traditional investigative means and, in addition, included court-authorized wiretap interceptions of cellular telephones used by Raul RODRIGUEZ-OROZCO, Juan Ramon PEREZ-MASCURRO, Alexander MAYORQUIN, and others which began in February of 2008. Intercepted conversations since February of 2008 which are referenced in the below information were obtained during the course of the court-authorized interceptions. Information contained within brackets [] from those calls are your affiant and other agents' interpretations of the meaning of terms utilized by the subjects based upon law enforcement training and experience and upon specific information gained through the course of the current investigation.

Undercover Drug Purchases in October and November of 2007

3. In October 2007, agents learned of a San Diego Police Department (SDPD) investigation into heroin distribution activities in downtown San Diego. The investigation involved the introduction of an undercover officer (UCO) to a San Diego heroin distributor identified as Robert James Pope. During subsequent undercover operations, the UCO discussed the purchase of heroin with Pope over the telephone, and Pope subsequently sent his girlfriend, a woman named Bianca Davis, to meet with the UCO and obtain the purchase money. Pope was, at the time, the subject of a parole warrant and so he did not leave the motel room in which he and Davis were staying

4. On October 9, 2007, during a covert purchase of approximately 7 grams of heroin from Pope, Davis obtained the purchase money from the UCO and was then observed meeting with a man named Richard Llanes in downtown San Diego to obtain the heroin. On October 10, 2007, during a covert purchase of approximately 20 grams of heroin from Pope, Davis again obtained the purchase money from the UCO and was then observed meeting with Llanes. Davis relayed to Pope, who then relayed to the UCO, that due to the quantity of heroin being purchased, Llanes had to go "further out" to obtain the heroin. Llanes was observed taking the trolley to National City, where Llanes was observed entering the passenger side of a gray Nissan Sentra bearing California license plate 5PIF129 and registered in the name Raul Rodriguez. Agents have previously observed this vehicle being driven by Raul RODRIGUEZ-OROZCO on numerous occasions. Llanes was driven in the Sentra to the next trolley stop where he exited the vehicle, and Llanes subsequently delivered the heroin to Davis, who gave it to the UCO.

5. Agents in the current investigation became aware of the San Diego Police Department undercover operation after the October 10, 2007 purchase. Based upon the apparent involvement of RODRIGUEZ-OROZCO, agents then coordinated with the San Diego Police Department and provided investigative support and funding for two additional drug purchases. On October 17, 2007, during a covert purchase of approximately 18 grams of heroin from Pope, Davis again obtained the purchase money from the UCO and was then observed meeting with Llanes. On this occasion, Davis accompanied Llanes on the trolley to National City, where Llanes was observed meeting with Raul RODRIGUEZ-OROZCO, who was

driving the gray Nissan Sentra. Davis waited at the trolley stop while Llanes met with RODRIGUEZ-OROZCO at the AM/PM gas station nearby. After Llanes exited the Sentra, Llanes was observed meeting with Davis and giving her an object from within his sock. Davis then returned to San Diego alone on the trolley and provided the heroin to the UCO. After leaving the meeting with Llanes, RODRIGUEZ-OROZCO was observed traveling to 1014 S. Evans Street, where he stopped briefly and spoke to an unknown individual in the street. RODRIGUEZ-OROZCO handed an unknown object to the individual before driving away.

6. On November 1, 2007, during a covert purchase of approximately 18 grams of heroin from Pope, Davis again obtained the purchase money from the UCO and was again observed meeting with Llanes. Llanes was observed taking the trolley to National City, where he again met with RODRIGUEZ-OROZCO, who was with another unknown male, in the gray Nissan Sentra. Llanes was dropped off at the trolley stop, and was observed traveling back to downtown San Diego where he met with Davis. Davis was observed retrieving an object from Llanes' sock, at which time she walked back to the UCO and provided the heroin to him.

March 10, 2008, Delivery of Heroin by Juan PEREZ-MASCURRO

7. Throughout the initial period of wire interceptions there were numerous intercepted conversations between Richard Llanes, the San Diego street level drug dealer mentioned above, and Raul RODRIGUEZ-OROZCO and Juan PEREZ-MASCURRO. Llanes was intercepted in multiple calls arranging for purchases of heroin from the two, and on March 10, 2008, he was arrested in possession of heroin. On that date at 3:07 p.m., Richard Llanes, in an intercepted call with Juan PEREZ-MASCURRO, asked if he could see PEREZ-MASCURRO, to which PEREZ-MASCURRO said yes. Llanes said that he had all of his money and he had his "first account" [Llanes would bring money which he owed to PEREZ-MASCURRO for past drug deliveries]. Llanes said he was leaving then and would call PEREZ-MASCURRO when he was passing "12th" [12th Street trolley stop]. At 3:44 p.m., Llanes told PEREZ-MASCURRO in a phone call that he was passing 12th and would be at the bus stop in three minutes. In a follow-up call at 3:54 p.m., Llanes told PEREZ-MASCURRO that he was at the bus stop.

8. Pursuant to the above conversations, agents/officers conducted surveillance at the 28th Street trolley station. At approximately 3:47 p.m., Richard Llanes was observed on the platform at the 28th Street trolley station. Llanes was observed walking up 28th Street to a bus bench. At approximately 3:55 p.m., Llanes was observed entering a green Dodge pickup truck, bearing California license plate 8F73471 and registered to Juan Perez. The Dodge truck was observed being driven around the area and then Llanes was dropped off at the 28th Street trolley station. Llanes was observed traveling back to the downtown area where Llanes was arrested by San Diego Police Department (SDPD) officers. Llanes was in possession of approximately 1/4 ounce of heroin which was concealed in Llanes' right sock at the time of his arrest. At the time of his arrest Llanes also possessed a handwritten list of telephone numbers which contained the telephone number of Juan PEREZ-MASCURRO listed under "J.A.", a number for Raul RODRIGUEZ-OROZCO listed under "R"; and the telephone number of a phone RODRIGUEZ-OROZCO had temporarily suspended the use of in February after he identified law enforcement surveillance was also listed under "R" but was scratched out.

March 21, 2008 Heroin Delivery

9. On March 21, 2008, Special Agents of the DEA were involved in an investigation, which resulted in the arrest of Jose Eduardo Contreras-Lopez for distribution of heroin to a Cooperating Source (CS). Prior to the arrest on March 21, 2008, DEA agents conducted surveillance at the residence of Contreras and observed a gray Nissan Sentra, bearing California license plates 5PIF129, and typically driven by Raul RODRIGUEZ-OROZCO, arrive at Contreras' residence. Shortly after the Nissan departed, Contreras exited his residence and subsequently distributed approximately five ounces of heroin to the CS.

When RODRIGUEZ-OROZCO learned that Contreras had been arrested, he fled his residence and stayed in a local hotel for several days. Raul RODRIGUEZ-OROZCO was intercepted over the court-authorized wiretap discussing the fact that Contreras was arrested, and that RODRIGUEZ-OROZCO still owed his (RODRIGUEZ-OROZCO's) narcotics supplier for the five ounces of heroin seized from Contreras.

10. On April 3, 2008, interceptions indicated that Alexander Florencio MAYORQUIN met with Raul RODRIGUEZ-OROZCO for the purpose of collecting money for narcotics which were previously delivered.

a. On April 3, 2008, Raul RODRIGUEZ-OROZCO was intercepted over a court-authorized wiretap talking to Alexander MAYORQUIN. During the call, RODRIGUEZ-OROZCO told Alexander MAYORQUIN that "Panza" [Juan PEREZ-MASCURRO] wasn't answering his phone. Alexander asked if "he" [PEREZ-MASCURRO] had the "invoices" [money]. Raul said "he" [PEREZ-MASCURRO] needed to bring "them" [money] over, because Raul wanted to send money over for the "Mexican ones" [unknown type of narcotics, probably heroin].

b. Later on the same date, Raul RODRIGUEZ-OROZCO was intercepted over a court-authorized wiretap talking to Juan PEREZ-MASCURRO. During the call, Raul RODRIGUEZ-OROZCO asked Juan PEREZ-MASCURRO if they (Raul and Juan) were going to pay "him" [Alexander MAYORQUIN] for "one of these" [unknown quantity of narcotics], to which Juan said no. Raul said "for the movies, the Mexican ones" [unknown quantity of narcotics, probably heroin] so they could "settle the account" [pay what is owed]. Juan said they would pay for those. Juan asked if Raul wanted him to head "over there" [stash location], to which Raul told Juan to come over "now" because "the guy" [Alexander MAYORQUIN] already called.

c. Later on the same date, Raul RODRIGUEZ-OROZCO was intercepted talking to Alexander MAYORQUIN. During the call, RODRIGUEZ-OROZCO asked Alexander MAYORQUIN how long before he's "there" [stash location] because he finally got hold of "Panza" [Juan PEREZ-MASCURRO]. Alexander MAYORQUIN responded that he was close by.

d. Later on the same date, Raul RODRIGUEZ-OROZCO was intercepted talking to Juan PEREZ-MASCURRO. During the call, Raul RODRIGUEZ-OROZCO told Juan PEREZ-MASCURRO to go "over there" [stash location] now, because "he's already there" [Alexander MAYORQUIN was at the stash location].

e. On April 3, 2008, pursuant to the above interceptions, agents/officers conducted surveillance in the vicinity of 2143 Ocean View Boulevard, San Diego, California. At approximately 1:30 p.m., officers observed a Nissan Sentra, bearing California license plate 5PIF129, which is typically driven by Raul RODRIGUEZ-OROZCO, parked on Ocean View Boulevard in the vicinity of the residence. At approximately 1:37 p.m., officers observed a Toyota Matrix, California license plate 5RID151, departing the area of 2143 Ocean View Boulevard.

April 3, 2008, 60 gram Methamphetamine Delivery by Juan PEREZ-MASCURRO

11. On April 3, 2008, interceptions over Juan PEREZ-MASCURRO's phone indicated that PEREZ-MASCURRO was going to deliver two ounces of an unknown type of narcotics (later found to be crystal methamphetamine) to an individual named Jocelyn Lim.

12. At approximately 11:28 a.m., in an intercepted call Jocelyn Lim asked Juan PEREZ-MASCURRO if he got "some" [narcotics]. PEREZ-MASCURRO replied that he thought so. Lim said that she needed "two ounces" [of an unspecified type of narcotics] in one hour. PEREZ-MASCURRO stated that he would call her back in 40 minutes. In a call at approximately 2:20 p.m., Jocelyn Lim asked if Juan

PEREZ-MASCURRO was "ready for her" [whether Juan had the narcotics], to which PEREZ-MASCURRO said yes. Lim repeated that she needed "two ounces." Lim further told PEREZ-MASCURRO that she would meet him at Chuck E. Cheese in an hour. PEREZ-MASCURRO asked if Lim wanted to meet earlier, to which Lim asked if PEREZ-MASCURRO could meet her in half an hour. At approximately 2:56 p.m., Jocelyn Lim told Juan PEREZ-MASCURRO that she was at Chuck E. Cheese. PEREZ-MASCURRO said he was on his way. IN a call at approximately 3:41 p.m., PEREZ-MASCURRO told Lim to follow him. Lim asked if he was in the green pick-up, to which PEREZ-MASCURRO said yes.

13. Pursuant to the above interceptions, agents/officers conducted surveillance in the vicinity of the Chuck E. Cheese restaurant near Plaza Boulevard and L Street. At approximately 3:40 p.m., officers observed PEREZ-MASCURRO's green Dodge Dakota pick-up truck approach a white BMW, bearing California license plate 5WCU512, which was parked behind the Chuck E. Cheese restaurant. Both vehicles then departed the parking lot and went down a residential street nearby. Shortly thereafter, the Dodge Dakota exited the residential street and departed the area. San Diego Police Department (SDPD) officers subsequently conducted a traffic stop of the white BMW, which was driven by Lim. A search was conducted of Lim's vehicle, at which time approximately two ounces of crystal methamphetamine was seized. Lim was arrested by SDPD at that time. A subsequent review of Lim's cell phone memory indicated recent call activity with PEREZ-MASCURRO's phone.

April 18, 2008 Seizure of 14 Pounds of Methamphetamine

14. On April 18, 2008, Adrian Jovan Rocha was arrested at the San Ysidro Port of Entry (POE), while attempting to enter the U.S. in a white Toyota Matrix, bearing California license plate 5RID151, which contained approximately fourteen (14) pounds of methamphetamine in a concealed compartment. The same Toyota Matrix, bearing California license plate 5RID151, had been observed on February 13, 2008 and March 13, 2008, at a location on Ocean View Boulevard, when intercepted conversations indicated that Raul RODRIGUEZ-OROZCO expected to receive a shipment of narcotics.

a. On April 19, 2008, Raul RODRIGUEZ-OROZCO was intercepted over a court-authorized wiretap talking to Juan Ramon PEREZ-MASCURRO. During the conversation, RODRIGUEZ-OROZCO told PEREZ-MASCURRO not to say anything, but "they busted the kid" [law enforcement arrested Rocha]. PEREZ-MASCURRO asked which one, to which RODRIGUEZ-OROZCO responded, the one that "Chepe" [their drug source of supply] used to send.

b. On May 15, 2008, Alexander MAYORQUIN was intercepted over a court-authorized wiretap talking to another individual. During the conversation, this person inquired whether Alexander MAYORQUIN had received the number [inmate booking number] for Adrian Jovan Rocha. MAYORQUIN-Villa then asked Alexander MAYORQUIN where [in Tijuana] he (Alexander) had turned the car over to "him" [Adrian Rocha]. Alexander responded "at El Rubi" [location in Tijuana]. MAYORQUIN-Villa asked if it was at a particular house or out in public, to which Alexander replied "in public."

May 20, 2008 Seizure of Methamphetamine and Heroin

15. On May 20, 2008, at approximately 11:41 a.m., RODRIGUEZ-OROZCO was intercepted in a telephone call talking to an individual named Michael Martin Perez. Perez said that he was sent to pick up some "DVD's" [pounds of methamphetamine]. Perez said that he was on Interstate 805. RODRIGUEZ-OROZCO told Perez to go to RODRIGUEZ-OROZCO's house because he (RODRIGUEZ-OROZCO) had "two" [two pounds of methamphetamine] there, and then they would go "over there" [to a drug stash location]. Perez said that he would prefer to meet RODRIGUEZ-OROZCO "over there" [stash location]. RODRIGUEZ-OROZCO told Perez to go over to RODRIGUEZ-OROZCO's house because he needed to take "that" [methamphetamine] and he (RODRIGUEZ-OROZCO) didn't have a driver's license.

a. Pursuant to the above interceptions, agents conducted physical surveillance in the vicinity of RODRIGUEZ-OROZCO's residence at 3203 Marlborough Avenue, San Diego, California. At approximately 11:59 a.m., a white Chevrolet Suburban, bearing Mexico license plates, was observed arriving at 3203 Marlborough Avenue, San Diego, California. Raul RODRIGUEZ-OROZCO entered the passenger seat of the Suburban and it departed the area. The Suburban was followed to the vicinity of 2143 Ocean View Boulevard, San Diego, California (the area of a known drug stash house used by RODRIGUEZ-OROZCO and PEREZ-MASCURRO), where the Suburban was observed driving in the alley directly behind the residence. At approximately 12:29 p.m., the Suburban departed the alley behind 2143 Ocean View Boulevard, San Diego, California and traveled north on Interstate 5.

b. A subsequent traffic stop was conducted by California Highway Patrol (CHP) who determined that the driver of the Suburban was Michael Martin Perez. A narcotics detection dog alerted positive to the rear area and gas tank area of the Suburban. The CHP officer also observed a non-factory bonding substance around the gas tank. A subsequent search of the vehicle resulted in identification of a concealed compartment, and the seizure of 7.68 pounds of methamphetamine and approximately 2.77 pounds of heroin. Following the arrest of Michael Martin Perez, intercepted telephone calls involving Raul RODRIGUEZ-OROZCO, Juan PEREZ-MASCURRO, and others indicated that they suspected that they were being investigated by law enforcement

July 2, 2008 Interceptions and Surveillance

16. On July 2, 2008, intercepted calls indicated that Alexander MAYORQUIN delivered two pounds of methamphetamine to Juan Perez-Mascurro.

a. On July 2, 2008, at approximately 4:30 p.m., Raul RODRIGUEZ-OROZCO was intercepted talking to Alexander MAYORQUIN. During the call, Alexander said he was going to deliver the "DVD's" [methamphetamine]. RODRIGUEZ-OROZCO asked how many, to which Alexander said "two" [two pounds of methamphetamine]. RODRIGUEZ-OROZCO told Alexander to take "them" [narcotics] out somewhere, or they could take them out at Raul's house. Alexander said he could take them out, but RODRIGUEZ-OROZCO had to go pick them up. RODRIGUEZ-OROZCO asked where, to which Alexander said Chula Vista. RODRIGUEZ-OROZCO said that was too far, and that he doesn't have a license. Alexander said that he had no other place. RODRIGUEZ-OROZCO repeated that he does not have a license, and that "Juan" [PEREZ-MASCURRO] was almost "out" [of work].

b. At approximately 4:34 p.m., Juan PEREZ-MASCURRO was intercepted was intercepted talking to Alexander MAYORQUIN. During the call, Alexander asked if "Raul" [Raul RODRIGUEZ-OROZCO] had called PEREZ-MASCURRO, to which PEREZ-MASCURRO said yes. PEREZ-MASCURRO said he was at the DMV and it would have to wait until he was done. Alexander said he would arrive in 1/2 hour and would call PEREZ-MASCURRO.

c. At approximately 5:36 p.m., Juan PEREZ-MASCURRO was intercepted talking to Alexander MAYORQUIN. During the call, Alexander asked if PEREZ-MASCURRO was "out" [of the DMV], to which PEREZ-MASCURRO said yes. Alexander said he was on Palm south of Main Street. Alexander told PEREZ-MASCURRO to make a right turn at Autozone, and to call Alexander when he was there.

d. Pursuant to the above interceptions, agents/officers conducted surveillance of Juan PEREZ-MASCURRO. PEREZ-MASCURRO was observed departing the vicinity of the DMV office in Chula Vista, and traveled south on Interstate 5 to Palm Avenue. PEREZ-MASCURRO traveled east on Palm Avenue, and turned southbound on 13th Street. PEREZ-MASCURRO was observed parking near a furniture warehouse on 13th Street. Agents observed Alexander MAYORQUIN enter the passenger side of PEREZ-MASCURRO's pickup truck, carrying a white bag. Shortly thereafter, Alexander exited the truck

without the bag. PEREZ-MASCURRO then departed the area and traveled to the vicinity of 5430 Churchward Street, San Diego, California, which is believed to be used by PEREZ-MASCURRO for temporary storage of narcotics.

July 10, 2008 Arrests and Searches

17. On July 10, 2008, intercepted telephone conversations revealed that Alexander Florencio MAYORQUIN was going to pick up money from Raul RODRIGUEZ-OROZCO and Juan Ramon PEREZ-MASCURRO. Based upon a number of intercepted calls on that day agents/officers established surveillance in the area of the same furniture warehouse mentioned above, where Alexander MAYORQUIN was identified as the driver of a vehicle which was followed from the location. MAYORQUIN was followed to a location in Chula Vista, California, where he met with Raul RODRIGUEZ-OROZCO and Juan Ramon PEREZ-MASCURRO, who had arrived together in a separate vehicle. At that location the money was transferred from the other two to MAYORQUIN, at which time MAYORQUIN departed in his vehicle and the two others departed in their vehicle. At that time all three individuals were arrested. Upon MAYORQUIN's arrest a large quantity of bundled U.S. currency was found in his possession. Search warrants were then executed after the arrests. Among the items found during the search of the residence used by Juan PEREZ-MASCURRO at 5430 Churchward Street, San Diego were distributable quantities of both methamphetamine and heroin.

Natalie Lambert
W. McClurine Jr.